

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

LEGACY RESTORATION, LLC,

Plaintiff,

- against -

OSWALDO “JUNIOR” BARAJAS, JOHN
DOE ENTITY 1, LEAH RAFFLES, AND
BRIAN WOLFF.

Defendants.

COMMERCIAL DIVISION

Index No. _____

Plaintiff designates New York County as the place of trial. The basis of venue is C.P.L.R. § 501.

AFFIRMATION OF BRAD HADAMIK

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I, Brad Hadamik, affirm under the penalty of perjury, pursuant to CPLR § 2106 that:

1. I am a Managing Director at FTI Consulting Technology, LLC (“FTI”).
2. I submit this affirmation in support of Plaintiff Legacy Restoration, LLC’s application by order to show cause for (1) a temporary restraining order, (2) a preliminary injunction, and (3) such other and further relief the Court deems just and proper.
3. I make this affirmation based on my personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify as set forth below.
4. On June 12, 2025, FTI created a forensic image and took possession of a Legacy-issued computer in the possession of Leah Raffles (the “Raffles Computer”). The chain of custody for the Raffles Computer is attached as **Exhibit A**.
5. Attached as **Exhibit B** are true and correct copies of excerpts of text messages extracted from the Raffles Computer associated Leah Raffles’ Apple ID. The “Me” listed in the extracted text messages is Leah Raffles. Contacts contained on the Raffles Computer reflect that the phone number ending in 2743 is for a contact named “Mom.” Contacts contained on the

Raffles Computer reflect that the phone number ending in 7988 is for a contact named “Junior Has Small Feet.”

6. Evidence on the Raffles Computer shows that the web browser history on the device was deleted, and that such deletion was more likely than not a manual deletion:

- On May 26, 2025, at 2:27:32 pm CT, the Raffles Computer reflects that the user typed in a search on the Chrome web browser for “clear cache on safari.”
- About one minute later, at 2:28:42 pm CT, the Safari web browser “last_seen” value within the history_event_listeners table was changed, indicating a change in the Safari browser history.
- Within the file com.apple.Safari.plist, the “ClearBrowsingDataLastIntervalUsed” value is set to “all history,” as shown by the image below. This means that the last time the user cleared her browsing data for Safari, she chose to delete all of her browsing history.

com.apple.Safari.plist		
Key	Type	Value
com.apple.Safari.plist	dict	{}
NSSplitView Subview Frames NSColorPanelSplitView	array	(2 items)
DidReportHistorySettings	boolean	true
NSWindow Frame NSSpellCheckerSubstitutionsPanel2	string	-973 -128 425 137 -1920 -252 1920 1055
NSNavLastRootDirectory	string	~/Desktop
ClearBrowsingDataLastIntervalUsed	string	all history
WebKitPreferences.hiddenPageDOMTimerThrottlingAutolIncreases	boolean	true
DidGrantSearchProviderAccessToWebNavigationExtensions	boolean	true
AutoplayPolicyWhitelistConfigurationUpdateDate	date	01/09/1970 17:15:56
PrivacyReportStartPageNumberOfTrackers	dict	(1 item)
DidMigrateWebDriverAllowRemoteAutomation	boolean	true

- I understand that Raffles was interviewed by counsel for the Company on June 12, 2025.
- On the Raffles Computer, Safari web browser history does not exist before June 12, 2025.

I affirm this 24th day of June, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



Brad Hadamik

**CERTIFICATION OF COMPLIANCE WITH
COMMERCIAL DIVISION RULE 17**

Pursuant to Rule 17 of the Commercial Division of the Supreme Court, ([22 NYCRR §202.70\(g\)](#)), I hereby certify that this Affirmation is 375 words in length, excluding the Caption and signature block. This word count was prepared in reliance upon the word count function of the word-processing system (Microsoft Word), used to prepare this document.

Dated: New York, New York
June 25, 2025

/s/ Melissa Colón-Bosolet
Melissa Colón-Bosolet